

Tricia B. O'Reilly  
Marc D. Haefner  
Mariel Belanger  
WALSH PIZZI O'REILLY FALANGA LLP  
Three Gateway Center  
100 Mulberry Street, Floor 15  
Newark, New Jersey 07102  
(973) 757-1100

*Counsel for Defendants  
Prudential Financial Inc. and  
Pruco Life Insurance Company*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DOYLE C. STONE, individually, and for  
all others similarly situated,

Plaintiff,

v.

PRUDENTIAL FINANCIAL, INC.,  
PRUCO LIFE INSURANCE COMPANY,

Defendants.

Civil Action No.: 21-CV-1551  
(SDW/LDW)

**NOTICE OF MOTION  
TO DISMISS**

*Electronically Filed*

**Oral Argument Requested**

**PLEASE TAKE NOTICE** that on May 17, 2021 or as soon as counsel may be heard, the undersigned, attorneys for Defendants Prudential Financial, Inc. and Pruco Life Insurance Company ("Defendants"), shall move before the Honorable Susan D. Wigenton, U.S.D.J., at the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey, for the entry of an Order dismissing Plaintiff's Complaint pursuant to Federal Rules of Civil Procedure

12(b)(1) and/or 12(b)(6) for lack of subject matter jurisdiction and failure to state a claim.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, the Defendants shall rely upon the accompanying Brief, Declaration of Tricia B. O'Reilly with exhibits 1-19 annexed thereto, and any subsequent Reply Brief, together with all pleadings and proceedings on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: April 16, 2021

WALSH PIZZI O'REILLY FALANGA LLP

*s/Tricia B. O'Reilly*

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